



HON. SYLVIA O. HINDS-RADIX
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THE CITY OF NEW YORK
LAW DEPARTMENT
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The parties' request is granted. Defendant shall respond to the Complaint by April 6, 2022. The parties shall file a joint status letter by April 8, 2022. The Court ordered mediation is also stayed until April 8, 2022.

March 2, 2022

VIA ECF

Hon. John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

SO ORDERED.

Date: March 2, 2022
New York, New York

Re: *L.L. v. N.Y.C. Dep't of Educ.*, 21-cv-9240 (JPC)(JLC) JOHN P. CRONAN
United States District Judge

Dear Judge Cronan:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), as well as for this action.

We write to respectfully request a 30-day extension Defendant's time to respond to the complaint from March 7 to April 6, 2022. This is the second request for an extension of this deadline. The first request was granted by Your Honor on November 30, 2021 (ECF No. 7). We also respectfully request a corollary 30-day extension of the parties' time to file a joint status letter, from March 9, to April 8, 2022. Plaintiff consents to our requests.

We are happy to report that Defendant has presented an offer of settlement to Plaintiff, and the parties are hopeful this matter will be settled shortly. As with the overwhelming majority of similar federal actions seeking IDEA fees and cost, we are hopeful that the parties will settle this matter without the need for any Court intervention.

Accordingly, we request a 30-day extension of Defendant's time to answer until April 6, 2022, and a 30-day extension of the parties' time to file a joint status letter until April 8, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/
Peter L. Germanakos
Special Assistant Corporation Counsel

cc: Lauren A. Baum, Esq. (via ECF)